

MARINE AQUARIUM SOCIETIES OF NORTH AMERICA

Concerning Docket: FAA-2002-13378 Reports by Carriers on Incidents Involving Animals During Air Transport

Please accept the suggestion of the Marine Aquarium Societies of North America (MASNA) for improving the clarity of this regulation. We represent marine aquarium hobbyists and their societies, and we are concerned that this regulation might have unintended consequences that might adversely affect us. We are concerned that this regulation, which is intended to protect the welfare of dogs and cats and other pets, that are transported as checked baggage on passenger flights, might be misinterpreted to include live fish and other forms of living animals which are not transported as checked baggage on passenger flights. These animals are traditionally transported as cargo, not checked baggage. Inspecting these animals for purposes of incident reporting is neither necessary nor desirable. Please consider inclusions or amendments to provide highly specific wording to prevent this potential misinterpretation.

Our fear is that a misinterpretation could result in extraordinary inspection procedures that could cause airlines to actually endanger the welfare of the animals it seeks to protect. Extensive labor expenditures from a misinterpretation would also undoubtedly result in great financial costs to be passed on to the shipper.

Our suggestion is intended to provide needed clarity to a sound regulation. Your efforts to ensure the proper care of dogs, cats, and other pets that are transported as checked baggage on passenger flights, are greatly appreciated.

With best regards,

John Brandt

Legislation Representative  
Marine Aquarium Societies of North America